

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

In the Matter of:

STAR EMS

Debtor(s)

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CASE NO. 12-70427

CHAPTER 11

APPLICATION TO RETAIN SPECIAL COUNSEL

NO HEARING WILL BE CONDUCTED ON THIS APPLICATION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS APPLICATION SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT ANY SCHEDULED HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

To the Honorable Judge of Said Court:

Comes Now, Star EMS , Debtor(s), hereinafter called Movant(s), respectfully show the Court the following:

1. Movant(s) filed their Chapter 13 Petition on July 26, 2012.
2. The Movant(s) may have a cause against Andrew Grey and any of his businesses or entitites, hereinafter referred to as "Grey", who performed billing services for client and for Grey's wrongful retention of documents and tangible and intangible items that belong to client. Grey may be sued in Federal Bankruptcy Court or any appropriate Federal Court or in State Court if approval by the Federal Bankruptcy Court is procured.

3. The Movant(s) desire to employ Francisco J. Rodriguez of the Law Office of Francisco J. Rodriguez and Melissa R. Carranza of the Law Office of Melissa R. Carranza on a contingency contract, to represent the interests of the Movant(s), if any, and the above entitled bankruptcy estate to prosecute the claim against the above named individual or entity. The attorneys have had experience in matters of this character and Movant(s) believe that the attorneys are qualified to represent them and the bankruptcy estate in this matter. The attorneys represents no interest adverse to the US Trustee or this bankruptcy estate and their employment would be in the best interest of this Estate. The prosecution of this cause of action is necessary for the successful reorganization of the Movant(s) bankruptcy estate. The attorney's mailing address, state bar number, telephone number, and e-mail address are set forth hereinbelow.

Francisco J. Rodriguez
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Federal Bar No. 3083

Melissa R. Carranza
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Tel: (956) 664-0500
Fax: (956) 664-0595
State Bar No. 24051884

4. The professional services to be rendered by the above-named attorneys would include the following:

- a. To assist the Movant(s) in the handling of the lawsuit against Andrew Grey and any of his businesses or entities.

b. To perform all other legal services for Movant(s) in connection with this and directly related matters which may be necessary and in the best interest of the Debtor(s)' bankruptcy estate.

5. The approval of this Application will not prejudice any parties-in-interests because Movant(s) anticipate that a recovery and/or settlement will be generated in this matter which will be a benefit to the creditors of the bankruptcy estate. Per the certificate of service, a copy of this Motion has been served upon the master mailing Matrix as constituted by the Court on the date of service.

6. After the performance of such legal services, or during the performance, upon proper application, the above named attorneys should be allowed reasonable compensation for services rendered as specified in their Contingent Contract of Employment attached hereto as Exhibit "A". Such fees and expenses shall be requested to be allowed as an administrative expense in this bankruptcy proceeding.

Wherefore, the Movants pray that they be authorized to employ and appoint Francisco J. Rodriguez of the Law Office of Francisco J. Rodriguez and Melissa R. Carranza of the Law Office of Melissa R. Carranza to represent the Movants and the above entitled bankruptcy estate in connection with the above referenced claim or claims against Andrew Grey and/or any of his businesses or entities, and that they have such other and further relief as is just.

Respectfully Submitted,

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By: /s/Jose Luis Flores

Jose Luis Flores
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DEBTOR'S BANKRUPTCY COUNSEL

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By: /s/Francisco J. Rodriguez

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By: /s/Melissa R. Carranza

Melissa R. Carranza
State Bar No. 24051884

CERTIFICATE OF SERVICE

I hereby certify that on 4th day of December, 2012 a true and correct copy of the above and foregoing was forwarded to the following parties and the parties listed on the Court's ECF transmission listed in this case via ECF e-notice, fax or U.S. Mail.

United States Trustee
Wilson Plaza, Suite 1107
606 N. Carancahua
Corpus Christi, Texas 78476

All Parties on the attached mailing matrix.

/s/Jose Luis Flores

Jose Luis Flores